

1 COUGHLIN STOIA GELLER  
2 RUDMAN & ROBBINS LLP  
3 SHAWN A. WILLIAMS (213113)  
4 100 Pine Street, 26th Floor  
5 San Francisco, CA 94111  
6 Telephone: 415/288-4545  
7 415/288-4534 (fax)  
8 shawnw@csgr.com  
9 - and -  
10 DARREN J. ROBBINS (168593)  
11 MARY K. BLASY (211262)  
12 655 West Broadway, Suite 1900  
13 San Diego, CA 92101  
14 Telephone: 619/231-1058  
15 619/231-7423 (fax)  
16 darenr@csgr.com  
17 maryb@csgr.com

18 Attorneys for Plaintiff

19 UNITED STATES DISTRICT COURT

20 NORTHERN DISTRICT OF CALIFORNIA

21 ALLAN CANDELORE, On Behalf of Himself ) No. C-07-05182-WHA  
22 and All Others Similarly Situated, )  
23 Plaintiff, ) CLASS ACTION  
24 )  
25 vs. )  
26 LDK SOLAR CO., LTD., et al., )  
27 )  
28 Defendants. )  
29 \_\_\_\_\_) No. C-07-05205-CRB  
30 THOMAS O' REILLY, )  
31 )  
32 Plaintiff, ) CLASS ACTION  
33 )  
34 vs. )  
35 LDK SOLAR CO., LTD., et al., )  
36 )  
37 Defendants. )  
38 \_\_\_\_\_)

39 [Caption continued on following page.]

40 **STIPULATION AND [PROPOSED] ORDER CONSOLIDATING RELATED**  
41 **ACTIONS AND DEFERRING RESPONSE DATE**

42

43

44

1 FREDRICK GRENWALD, individually and ) No. C-07-05259-MHP  
on Behalf All Others Similarly Situated, )  
2 ) CLASS ACTION  
3 Plaintiff, )  
4 vs. )  
5 LDK SOLAR CO., LTD., et al., )  
6 Defendants. )  
7 \_\_\_\_\_ )  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1           WHEREAS, there are currently three related securities class action lawsuits instituted on  
 2 behalf of the stockholders of LDK Solar Co. Ltd. (“LDK”) pending in this District;

3           WHEREAS, consolidation of these related actions will promote judicial economy, avoid  
 4 duplicative law and motion and discovery proceedings, and streamline adjudication of these related  
 5 matters;

6           WHEREAS, a lead plaintiff has not yet been appointed pursuant to 15 U.S.C. §78u  
 7 4(a)(3)(B) of the Securities Exchange Act of 1934;

8           WHEREAS, LDK and LDK Solar USA, Inc., through their counsel of record indicated  
 9 below, have agreed to waive process of service without waiving any challenges as to jurisdiction or  
 10 venue; and

11          WHEREAS, the agreed-upon schedule is not for the purpose of delay, promotes judicial  
 12 efficiency, and will not cause prejudice to either party,

13          IT IS HEREBY STIPULATED by the parties, through their counsel of record, that:

14          1.       The following actions are hereby consolidated for all purposes, including pretrial  
 15 proceedings, trial and appeal, pursuant to Fed. R. Civ. P. 42(a):

16 <b>Abbreviated Case Name</b>	17 <b>Civil Case No.</b>	18 <b>Date Filed</b>
<i>Candelore v. LDK Solar Co., Ltd., et al.</i>	07cv05182	10/09/07
<i>O'Reilly v. LDK Solar Co., Ltd., et al.</i>	07cv05205	10/11/07
<i>Greenwald v. Peng, et al.</i>	07cv05259	10/16/07

19          2.       The caption of these consolidated cases shall be “*In re LDK Solar Securities*  
 20 *Litigation*” and the files of this action shall be maintained in one file under Master File  
 21 No. C-07-05182-WHA. Any other actions now pending or hereafter filed in this District which arise  
 22 out of the same facts and claims as alleged in these related actions shall be consolidated for all  
 23 purposes, if and when they are brought before this Court and the Court accepts the transfer and  
 24 approves consolidation;

25          3.       Without waiving any challenges to jurisdiction or venue, LDK and LDK Solar USA,  
 26 Inc., through their counsel of record indicated below, agree to waive process of service;



1 as lead counsel by regular mail, but must continue to serve lead plaintiff's counsel by overnight mail  
2 service, hand delivery, or facsimile.

3 IT IS SO STIPULATED.

4 DATED: November 6, 2007

COUGHLIN STOIA GELLER  
RUDMAN & ROBBINS LLP  
DARREN J. ROBBINS  
MARY K. BLASY

7 \_\_\_\_\_  
8 s/ MARY K. BLASY  
MARY K. BLASY

9 655 West Broadway, Suite 1900  
10 San Diego, CA 92101  
Telephone: 619/231-1058  
619/231-7423 (fax)

11 COUGHLIN STOIA GELLER  
12 RUDMAN & ROBBINS LLP  
13 SHAWN A. WILLIAMS  
14 100 Pine Street, 26th Floor  
San Francisco, CA 94111  
Telephone: 415/288-4545  
415/288-4534 (fax)

15 Attorneys for Plaintiff Allan Candelore

16 DATED: November 6, 2007

SCHATZ NOBEL IZARD P.C.  
ANDREW M. SCHATZ  
JEFFREY S. NOBEL  
MARK P. KINDALL

19 \_\_\_\_\_  
20 s/ MARK P. KINDALL (with permission)  
MARK P. KINDALL

21 20 Church Street, Suite 1700  
22 Hartford, CT 06103  
Telephone: 860/493-6292  
860/493-6290 (fax)

24 Attorneys for Plaintiff Thomas O'Rielly

1 DATED: November 6, 2007

GLANCY BINKOW & GOLDBERG LLP  
LIONEL GLANCY

2

3

4

s/ LIONEL GLANCY (with permission)  
LIONEL GLANCY

5

6

7

1801 Avenue of the Stars, Suite 311  
Los Angeles, CA 90067  
Telephone: 310/201-9150  
310/201-9160 (fax)

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

GLANCY BINKOW & GOLDBERG LLP  
SUSAN G. KUPFER  
One Embarcadero Center, Suite 760  
San Francisco, CA 94115  
Telephone: 415/972-8160  
415/972-8166 (fax)

Attorneys for Plaintiff Fredrick Greenwald

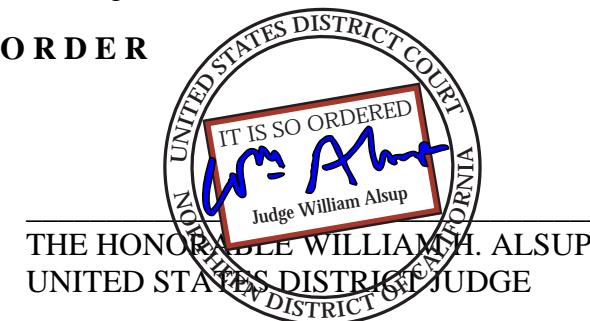
LATHAM & WATKINS LLP  
JAMES J. FARRELL

s/ JAMES J. FARRELL (with permission)  
JAMES J. FARRELL

633 West Fifth Street, Suite 4000  
Los Angeles, CA 90071-2007  
Telephone: 213/485-1234  
213/891-8763 (fax)

Attorneys for Defendants LDK Solar Co., Ltd.,  
LDK Solar USA, Inc., Xiaofeng Peng, XingXue  
Tong, and Jack Lai

21 ORDER



IT IS SO ORDERED.  
DATED: November 7, 2007.

24 THE HONORABLE WILLIAM H. ALSUP  
25 UNITED STATES DISTRICT JUDGE

## CERTIFICATE OF SERVICE

I hereby certify that on November 6, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 6, 2007.

s/ MARY K. BLASY  
MARY K. BLASY

COUGHLIN STOIA GELLER  
RUDMAN & ROBBINS LLP  
655 West Broadway, Suite 1900  
San Diego, CA 92101-3301  
Telephone: 619/231-1058  
619/231-7423 (fax)

E-mail: maryb@csgrr.com

# Mailing Information for a Case 3:07-cv-05182-WHA

## Electronic Mail Notice List

The following are those who are currently on the list to receive e-mail notices for this case.

- **Mary K. Blasy**  
maryb@lerachlaw.com,e\_file\_sf@lerachlaw.com
- **Darren Jay Robbins**  
e\_file\_sd@csgrr.com
- **Shawn A. Williams**  
shawnw@csgrr.com,travisd@csgrr.com,moniquew@csgrr.com,e\_file\_sf@csgrr.com,cwooc

## Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)